



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JAN 30 2015

CERTIFIED MAIL 7009 1680 0000 7677 8152
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. Scott C. Wolff
Environmental Systems Coordinator
Serigraph, Incorporated
3801 East Decorah Road
West Bend, Wisconsin 53095

Re: Notice of Violation
Compliance Evaluation Inspection
WIT 560 011 215

Dear Mr. Wolff:

On November 19, 2014 a representative of the U.S. Environmental Protection Agency inspected the Serigraph, Inc. facility located in West Bend, Wisconsin (Serigraph). As a large quantity generator of hazardous waste, Serigraph is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Serigraph's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Serigraph, EPA's review of records pertaining to Serigraph, and the inspector's observations, EPA has determined that Serigraph has unlawfully stored hazardous waste without a license or interim status as a result of Serigraph's violation of certain requirements for a license exemption under Wisconsin Administrative Code (WAC) § NR 662.034(1)-(3). EPA has identified the license exemption requirements violated by Serigraph as of the date of the inspection in paragraphs 1 and 2, below.

Also, EPA has determined that Serigraph violated RCRA requirements related to universal waste as described in paragraph 3, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, Serigraph violated the following large quantity generator license exemption requirements:

1. Under WAC § NR 662.034(1) [40 C.F.R. § 262.34(a)], a large quantity generator may accumulate hazardous waste on-site for 90 days or less without a license or interim status unless the generator has been granted an extension of the 90-day period. The generator must comply with the requirements for owners or operators in

Subchapter C (preparedness and prevention) and subchapter D (contingency plan and emergency procedures) of Chapter NR 665 and sections NR 665.0016 and 668.07(1)(e). See, WAC § NR 662.034(1)(d) [40 C.F.R. § 262.34(a)(4)]. Specifically, a copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals and state and local emergency response teams that may be called upon to provide emergency services. See, WAC § NR 665.0053(2) [40 C.F.R. § 265.53(b)].

At the time of the inspection, Serigraph had not distributed copies of the contingency plan to local police departments, fire departments, hospitals and state and local emergency response teams that may be called upon to provide emergency services.

2. Under WAC § NR 662.034(3)(a) [40 C.F.R. § 262.34(c)(1)], a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in WAC § NR 661.33(5) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without an operating license or interim license and without complying with sub (1) provided the generator does certain actions including: keeping containers closed during storage and marks the containers with the words "Hazardous Waste" or with other words that identify the contents of the containers.

At the time of the inspection of the Recycling Area, Serigraph had not labeled a container of hazardous waste and had not covered a container of hazardous waste, see photograph number 7.

OTHER VIOLATIONS

3. Universal Waste Requirement

Under WAC § NR 673.13(4)(a) [40 CFR § 273.13(d)(1)], a small quantity large quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps. The containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. Also, under WAC § NR 673.14(5) [40 CFR § 273.14(e)], each lamp or a container or package in which the lamps are contained must be labeled or marked clearly with the phrase "Universal Waste-Lamps", "Waste Lamps" or "Used Lamps".

Serigraph is a small quantity handler of universal waste because it does not accumulate more than 5,000 kilograms (11,025 pounds) of universal waste at any time.

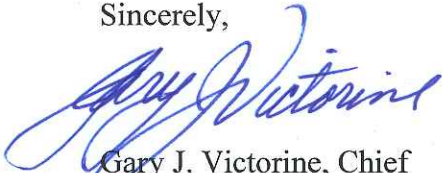
At the time of the inspection, Serigraph's containers of used lamps were not closed and were not labeled with the phrase "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps," see photograph number 5.

At this time, EPA is not requiring Serigraph to apply for a Wisconsin hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined in paragraphs 1 and 2, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and universal waste requirements. You should submit your response to Walt Francis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Walt Francis, of my staff, at 312-353-4921 or at francis.walt@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: John Schwabe, WDNR-Waukesha Service Center
(john.schwabe@wisconsin.gov)
Michael Ellenbecker, WDNR-Sturtevant Service Center
(michael.ellenbecker@wisconsin.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: SERIGRAPH, INC. PLANT 2
FACILITY U.S. EPA ID NO.: WIT 560 011 215
FACILITY TYPE: Large Quantity Generator
FACILITY ADDRESS: 3801 E. Decorah Road
West Bend, Wisconsin 53095
U.S. EPA REPRESENTATIVE: Walt Francis
DATE OF INSPECTION: November 19, 2014
SIC CODE: 2759 – Commercial Printing, Not Elsewhere Classified
NAICS CODE: 323110 – Commercial Lithographic Printing
323112 – Commercial Flexographic Printing
323113 – Commercial Screen Printing

PREPARED BY: Walt Francis
Walt Francis
Environmental Scientist

12/1/2014
Date

ACCEPTED BY: Julie Morris
Julie Morris, Chief
Compliance Section 2
RCRA Branch

12/3/14
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at Serigraph, Inc., Plant 2 (Serigraph) located at 3801 East Decorah Road, West Bend, Wisconsin to determine compliance with the Resource Conservation and Recovery Act (RCRA) and the Wisconsin Administrative Code (WAC), with respect to Serigraph's management of hazardous waste, universal waste and used oil.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Representatives of Serigraph, Inc. -
Nick Leifeld, Vice President Quality/Regulatory Compliance
Scott C. Wolff, Environmental Systems Coordinator

Site Description/Background Information

Serigraph, Inc. operates four facilities in the West Bend Area. These facilities include Plant 1, located at 3701 East Decorah Road, Plant 2, located at 3801 East Decorah Road, Plant 3, located at 603 Hi Mount Road, and the Specialty Fulfillment Center located at 901 Lang Street. Plant 1 is considered to be part of Plant 2 as it is contiguous to Plant 2. Plants 1 (89,000 square foot facility) and Plant 2 (180,000 square foot facility) include manufacturing offices, prepress operations, sheet fed lithographic printing functions, and post printing functions such as forming, laminating packing, and shipping. Materials used include photographic supplies such as film, positive and negative plate developer, ultra violet (UV) cured inks, fountain solutions, and solvents. The UV inks consist of acrylated monomers and oligomers. Fountain solutions are comprised of water and isopropanol and/or glycol ethers. Serigraph, Inc. Plants 1 and 2 generate: Waste Screen Printing Ink, D001; Waste Solids Containing Flammable Liquid, "Dried P-Matte", D001/F003/F005; Waste Solids Containing Flammable Liquid "PVC Pipe with Ink and Mylar Film, D001; Rags Contaminated with Solvent, D001/F003/F005; Water Based Ink and Rags, Non-RCRA regulated; UV Screen Ink, Non-RCRA regulated; Parts Cleaner Blend 4637, Non-RCRA Regulated; Water Base Screen Ink, Non-RCRA Regulated; and UV Ink Metallic Pigment, Non-RCRA Regulated. In addition, Serigraph generates solvent contaminated wipes, used oil, screen room sludge, oil contaminated debris, Azo-Purge MP2, used antifreeze; digital ink, oily water, used batteries, and used fluorescent lamps. Serigraph, Inc. originally submitted an EPA Form 8700-12 on December 12, 1980 for Plant 1. The Serigraph facility (Plants 1 and 2) currently have approximately 450 employees, operates three shifts and primarily screen print items for the automotive and appliance industries. The Serigraph Plant 2 facility was constructed in 1997. In addition, Serigraph, Inc. has a facility in Mexico.

At the time of the inspection, the Serigraph facility was operating as a Large Quantity Generator

(LQG) of hazardous waste. Historical hazardous waste streams based on the 2013 Biennial Report included off-site shipments of: Waste Solvent Screen Ink from Printing Operation, D001; Waste Cleanup Solvent from Screen Printing Operation, D001, Waste Catalyzed Ink from Screen Printing Processes, F003, Rags Contaminated with Solvent, D001; Waste Cleanup Solvent from Tower Coater, D001; UV Blanket and Roller Wash, D001. At the time of the inspection, the last off-site shipment of hazardous waste was on November 4, 2014. Other wastes include: 1) used oil; 2) used fluorescent lamps; 3) used shop towels; and 4) used aqueous parts washer solution. Used shop towels are picked up by ITU Absorb Tech, New Berlin, Wisconsin for laundering. WDNR provided U.S. EPA with a copy of a November 4, 2014, "Hazardous Waste Manifest Records For Selected Generator" report for the period January 1, 2013 to November 4, 2014 for out-bound shipments of hazardous waste from the West Bend, Wisconsin facility. The WDNR out-bound manifest report indicated that hazardous waste D001, F003/F005/D001, F003/D001, D008/D009, and D001/D007/D008 wastes were shipped to WRR Environmental Services (WID990829475), Safety-Kleen, Inc. – Dolton (ILD980613913), and Rineco Chemical Industries (ARD981057870). For the period May 23, 2013 through July 15, 2014, Serigraph made nine shipments ranging from 459 pounds to 8,615 pounds of hazardous waste.

Opening Conference

U.S. EPA representative Walt Francis arrived at the Serigraph facility at approximately 9:00 a.m. Inspector Francis introduced himself to Mr. Nick Leifeld, Vice President Quality/Regulatory Compliance. Mr. Leifeld took the inspector to his office. Inspector Francis presented his credentials to Mr. Leifeld, and informed him of the nature, scope, and procedures of the inspection. The inspection was conducted by U.S. EPA. WDNR declined to participate in the inspection. Mr. Leifeld told Inspector Francis that Mr. Scott Wolff is responsible for hazardous waste but was out of the office. Mr. Leifeld told Inspector Francis that Mr. Wolff would return to the office shortly. Mr. Leifeld provided the inspector with a brief overview of the main facility, and provided information on the Plant 2 facility and Plant 1 facility. Mr. Leifeld explained the various hazardous wastes generated at both plants. Inspector Francis asked Mr. Leifeld about used oil and universal waste. Mr. Leifeld explained to the inspector that used oil and universal waste were picked up by Enviro-Safe Resource Recovery, Germantown, Wisconsin (WIR000142877). Inspector Francis reviewed several out-bound hazardous waste manifests records, and discussed the operation of the facility. Inspector Francis noted that the outbound tracking report indicated the last off-site shipment of D001 and F003/F005/D001 was on July 15, 2014. Serigraph did not make a CBI claim on the information gathered during the inspection. Mr. Leifeld allowed the inspector access to the facility to conduct the inspection.

Site Tour

The walk-through began at the Receiving Area. Mr. Leifeld showed the inspector the "Dirty Rag" accumulation area. Inspector Francis observed four 55-gallon containers, see photograph number 1. Mr. Leifeld explained to Inspector Francis that ITU Absorb Tech, New Berlin, Wisconsin picks up the dirty rags, launders them, and returns the clean rags to the facility. Mr.

Leifeld showed Inspector Francis the Biofilter Room and an example of the bark media. Inspector Francis asked Mr. Leifeld if the Biofilter generates any sludge. Mr. Leifeld told Inspector Francis that the Biofilter discharges to the West Bend city sewer and did not generate a sludge. The walk-through continued to the Print Room and then to the Molding Area. Mr. Leifeld showed Inspector Francis several gaylord boxes of polycarbonate scrap which is recycled. Inspector Francis observed a 55-gallon container labeled "Glyco", see photograph number 2. The walk-through continued to the Die Cutting Area, the Forming Department, and the Maintenance Department. In the Maintenance Department, Mr. Leifeld showed the inspector a 55-gallon SAA container for used acetone, see photograph number 3. Inspector Francis observed a parts washer labeled "Barsol A-4659". The walk-through continued to the Printing Area. Mr. Leifeld showed Inspector Francis the Screen Cleaning Room. Mr. Leifeld told Inspector Francis that the wash water is piped to the Biofilter. The walk-through continued to the Screen Room and then the Ink Room. In the Ink Room, Mr. Leifeld showed Inspector Francis five 55-gallon containers, see photograph number 4. Inspector Francis noted a 55-gallon container labeled "Metallic Inks that had been solidified", a 55-gallon container labeled "Waste UV Screen Ink", a 55-gallon container labeled "Waste Conventional Screen Ink", a 55-gallon container labeled "Waste Water Based Screen Ink", and a 55-gallon container labeled "Waste Wipes". The walk-through continued to the Recycling Area. Mr. Leifeld showed Inspector Francis a 55-gallon container labeled "Ink with PVC Pipe", a 55-gallon container labeled "Dried P-Matte", a 55-gallon container labeled "Conventional Screen Ink", and a 55-gallon container labeled "Excluded Solvent Contaminated Wipes", see photograph number 9. Inspector Francis observed a 5-gallon pail under a trough device, see photograph number 7. Mr. Leifeld showed Inspector Francis the universal waste accumulation area (see photographs number 5, 10, and 11), and 55-gallon container labeled "Used Oil". Mr. Leifeld showed Inspector Francis the aerosol can puncturing device 55-gallon SAA container. Inspector Francis observed a 5-gallon pail near the aerosol can puncturing device, see photograph number 8. Mr. Leifeld showed Inspector Francis the empty hazardous waste less than 90 day accumulation area, see photograph number 6. The walk-through continued to the Printing Area. Mr. Leifeld showed Inspector Francis a five color press and several one color printing presses. The walk-through continued to Plant 1. Mr. Leifeld showed Inspector Francis an Off-Set Press. The walk-through continued to a room where Mr. Leifeld showed Inspector Francis a 55-gallon container labeled "Used Oil". The walk-through continued to Die Cutting Area and then to the Finish Area and Quality Control. The inspection group then returned to a conference room in Plant 2.

Records Review

Mr. Wolff met Inspector Francis and Mr. Leifeld at the conference room. Mr. Wolff provided Inspector Francis with waste profiles from Enviro-Safe Resource Recovery, Germantown, Wisconsin on the Dried P-Matte, Conventional Screen Ink, UV Screen Ink, Excluded Solvent Contaminated Wipes, and Used Oil. Mr. Leifeld also provided Inspector Francis with an MSDS on the Barsol-A4659 solvent and told Inspector Francis that the "Excluded Solvent Contaminated Wipes" are shipped to Covanta, Indianapolis, Indiana. Mr. Wolff also provided Inspector Francis with hazardous waste manifest and bills of lading. The last outgoing hazardous waste, universal

waste and used shipment was on November 4, 2014. In addition, Mr. Leifeld provided the inspector with a December 4, 2012 version of the Serigraph Contingency Plan. Mr. Leifeld provided training records for Mr. Jesse Kreis, Ms. Terri Lemke, Ms. Sandra Schultz, and Mr. David Fellenz. The last hazardous waste training was offered February 24, 2014. Mr. Wolff also showed Inspector Francis weekly inspection logs.

Closing Conference

The inspector conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. Serigraph would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists and a copy of the photographs taken during the inspection. Inspector Francis discussed the contingency plan distribution requirements, an open 5-gallon container in the Recycling Area, universal waste labeling and container requirements. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, a U.S. EPA Managing Used Oil Advice for Small Businesses fact sheet, and a University of Wisconsin Extension Solid and Hazardous Waste Education Center Environmental Programs brochure to Mr. Leifeld.

Attachments

Inspection Checklists.

Photographs.



Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	Y	662.011
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	Y	662.011(3)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers. <i>Enviro-Safe - Waste Partners</i>	N/A	662.011(3)(a)1
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.040(3)
E. Generator submitted a notification form and obtained an EPA ID#.	Y	662.012
Note: A subsequent notification should be submitted when there is an ownership or name change.		

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	Y	662.020(1)
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	Y	662.020(1)
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2)
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	Y	662.023(3)
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	Y	662.020(1)
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	N/A	662.034(13)
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.034(13)
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1)
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1)
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected
Noncode ? : Y: Yes N: No UN: Unknown

Notes : *: Dept. approved alternate may apply No 'box' is an open ended question

Page 1 of 14

d_report_inspection_print_ff



LARGE QUANTITY GENERATOR INSPECTION

Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	Y	662.031
L. Hazardous waste is marked according to applicable DOT requirements before transport.	Y	662.032(1)
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2)
N. Placards are offered to the initial transporter.	Y	662.033

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1)
B. Generator complies with the prohibition against dilution of wastes.	Y	668.03
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1)
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1)
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	Y	668.07(1)
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	Y	668.07(1)
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h)
H. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1)
I. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2)
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	✓/X	662.034(1)(d)

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected
Noncode ? : Y: Yes N: No UN: Unknown

Notes : *: Dept. approved alternate may apply No 'box' is an open ended question

Page 2 of 14

d_report_inspection_print.ft



Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	Y	662.041
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	Y	662.042(1)
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	N/A	662.042(2)
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.034(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	Y	662.034(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	Y	662.034(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	662.034(1)(d)
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.034(1)(d)

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A. 12/4/12 N/A	Y	662.034(1)(d)
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LARGE QUANTITY GENERATOR INSPECTION

Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).

Y

662.034(1)(d)

C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0053(2)).

N

662.034(1)(d)

D. Contingency plan was amended due to ANY of the following (NR 665.0054):

1. Contingency plan failed in an emergency.
2. Change in site design, construction, O&M, or other circumstances which affect emergency response.
3. Emergency coordinators changed.
4. Emergency equipment changed.

Y

662.034(1)(d)

E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055):

1. Available or on call to coordinate emergency response measures.
2. Familiar with all aspects of site activities and the contingency plan.
3. Has authority to commit the resources needed to carry out the contingency plan.

Y

662.034(1)(d)

F. Contingency plan includes ALL of the following (NR 665.0052):

1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. *→ none*
2. Name, address and phone number, office and home, for each emergency coordinator.
3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services.
4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes.
5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge.
6. List of emergency equipment at the site, including location, description and capabilities of each item.

N

662.034(1)(d)

NO ALTERNATE LISTED.

G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056):

1. Activate internal alarms or communication systems.
2. Notify appropriate authorities, if their help is needed.
3. Identify the character, source, amount, and extent of discharged hazardous materials.
4. Assess hazards to human health and the environment.
5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003).
6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread.
7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation.
8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material.
9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed.
10. Ensure that emergency equipment is clean and fit for use prior to resuming operations.
11. Notify the department and appropriate state and local authorities before resuming operations.
12. Submit an incident report to the department within 15 days.

Y

662.034(1)(d)



LARGE QUANTITY GENERATOR INSPECTION

Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d)
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)). <i>SCOTT WULFF</i>	Y	662.034(1)(d)
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	Y	662.034(1)(d)
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	662.034(1)(d)
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	Y	662.034(1)(d)
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d)
G. Personnel take part in an annual review of the training (NR 665.0016(3)). <i>2013 + 2014</i>	Y	662.034(1)(d)
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	Y	662.034(1)(d)
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	Y	662.034(1)(d)

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9. <i>NOTE: NO CONTAINERS.</i>	Y	
B. Accumulation start date is clearly marked and visible for inspection on each container.	N/A	662.034(1)(b)
C. All containers are clearly marked with the words "Hazardous Waste".	N/A	662.034(1)(c)

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LARGE QUANTITY GENERATOR INSPECTION

Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	Y	662.034(1)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(1)(a)1
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(1)(a)1
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	Y	662.034(1)(a)1
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	Y	662.034(1)(a)1
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	Y	662.034(1)(a)1
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	Y	662.034(1)(a)1
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	Y	662.034(1)(a)1
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.034(1)(a)1

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration $\geq 10\%$ by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2)). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service. 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	N/A	
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a)
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a)

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Page 6 of 14

d_report_inspection_print_ff



LARGE QUANTITY GENERATOR INSPECTION

Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 9: Subchapter BB Standards for Equipment Leaks

D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a)
E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.		662.034(1)(a)
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.		662.034(1)(a)
G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).		662.034(1)(a)
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.		

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 11.A. (NR 665.1087(2)(a), NR 662.034(1)(a)1). 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	Y	
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	NE	
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).	Y	662.034(1)(a)1
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.	N	

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Page 7 of 14

d_report_inspection_print_ff



LARGE QUANTITY GENERATOR INSPECTION

Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 10: Subchapter CC Level 1 Container Standards

E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements	N/A	
F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers	N/A	
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Section 11.	NO	
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	Y	662.034(1)(a)1
I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).	N/A	662.034(1)(a)1
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).	N/A	662.034(1)(a)1
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	N/A	662.034(1)(a)1
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	N/A	662.034(1)(a)1
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).	N/A	662.034(1)(a)1
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	N/A	662.034(1)(a)1

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Page 8 of 14

d_report_inspection_print_ff



Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

Section 10: Subchapter CC Level 1 Container Standards

O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	N/A	662.034(1)(a)1
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).	N/A	662.034(1)(a)1
Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).	N/A	662.034(1)(a)1

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.	NO	
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		662.034(1)(a)2
C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.		662.034(1)(a)2
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2

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Page 9 of 14

d_report_inspection_print_ff



LARGE QUANTITY GENERATOR INSPECTION

Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 11: Subchapter CC Level 2 Container Standards

I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)		662.034(1)(a)2
J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)2
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)		662.034(1)(a)2
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)		662.034(1)(a)2
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)		662.034(1)(a)2

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	NO	
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2
C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	Y	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.034(3)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.034(3)(a)

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Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

Section 13: Satellite Accumulation

D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(3)(a)1
E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	Y	662.034(3)(a)1
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)). <i>Recycling bins - 5 on site</i>	N	662.034(3)(a)1
G. Containers are marked "Hazardous Waste" or with other words that identify the contents. <i>Recycling bins - 5 on site</i>	N	662.034(3)(a)2
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	Y	662.034(3)(b)
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	Y	662.034(3)(b)

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report. <i>SCAP Reduction Plan</i>	Y	662.041(3)(e)
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. <i>Reds - Excluded.</i>	Y	662.027(1)
Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.		

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	Y	
B. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	Y	679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.	Y	679.22(2)
D. Used oil containers and tanks are marked "used oil".	Y	679.22(3)(a)
E. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement.	Y	679.24



Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

Section 15: Used Oil

F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.	Y	679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11

Section 16: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 17. Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	Y	
B. Universal waste has not been disposed, treated or diluted. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	Y	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	Y	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	N	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler. <i>last inspection 11/4/14</i>	Y	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.15(2)
H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received. 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	N	673.15(3)
I. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.16



Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

Section 16: Universal Waste

J. ALL of the following are met when a release occurs:

1. Release is immediately contained.
2. A waste determination is made.
3. Spill residue is disposed of properly as solid or hazardous waste.

Y

673.17

K. Handler sends the waste to a destination facility, foreign destination or another handler.
Indicate the facilities in the comments section.

Y

673.18(1)

L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.

Y

673.18(3)

M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form.

1. Universal waste are sorted or disassembled.
2. Recalled pesticides are managed.
3. Universal waste shipments have been rejected.
4. Universal waste shipments have included hazardous or solid waste.
5. Universal waste is self-transported.

N

Section 17: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 18.

NO

B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.

662.034(7)

C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.

662.034(7)(a)

D. The F006 waste is legitimately recycled through metals recovery.

662.034(7)(b)

E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.

662.034(7)(c)

F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.

662.034(7)(d)1.a

G. The accumulation start date is clearly marked and visible for inspection on each container.

662.034(7)(d)3

H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.

662.034(7)(d)1.b

I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".

662.034(7)(d)4

J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.

662.034(7)(d)1.c

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Page 13 of 14

d_report_inspection_print_#



LARGE QUANTITY GENERATOR INSPECTION

Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 17: F006 Wastewater Treatment Sludge

K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.

662.034(7)(d)5

L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.

662.034(8)

Section 18: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.

Y 662.034(1)

B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).

N

C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).

D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)):

1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment.
2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.

N/A

662.034(1)(a)2



Photograph #1 – Receiving Area, “Dirty Rag” Accumulation Containers



Photograph #2 – Molding Department, 55-Gallon “Glyco” Container

Serigraph, Inc.
West Bend, Wisconsin
11/19/2014



Photograph #3 – Maintenance Department, 55-Gallon SAA Container of Waste Acetone



Photograph #4 – Ink Room, Five 55-Gallon Waste Containers



Photograph #5 – Recycling Area, Two Containers of Universal Waste Lamps



Photograph #6 – Recycling Area, Hazardous Waste Less Than 90 Day Accumulation Area

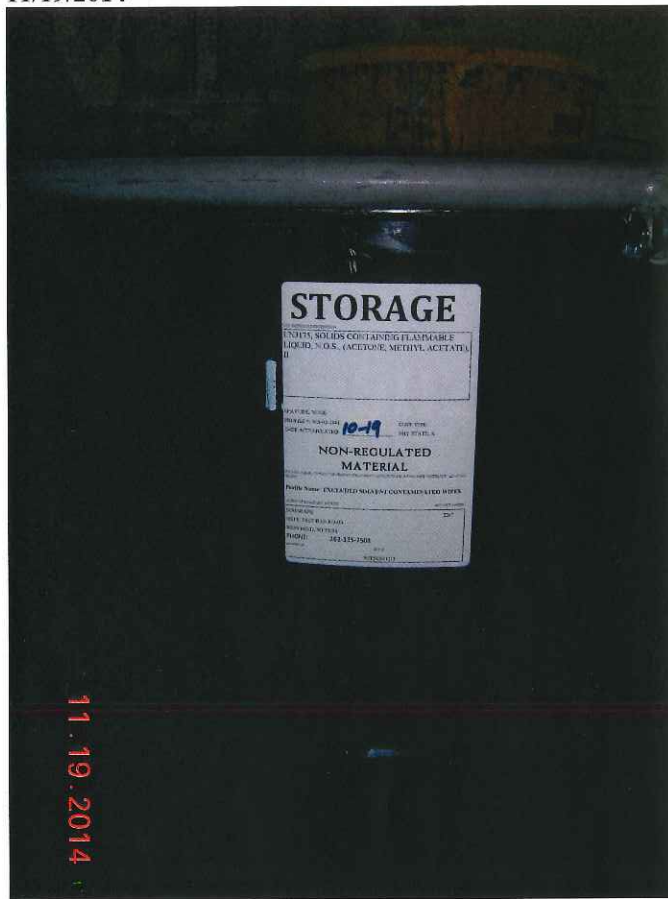


Photograph #7 – Recycling Area, 5-Gallon Pail

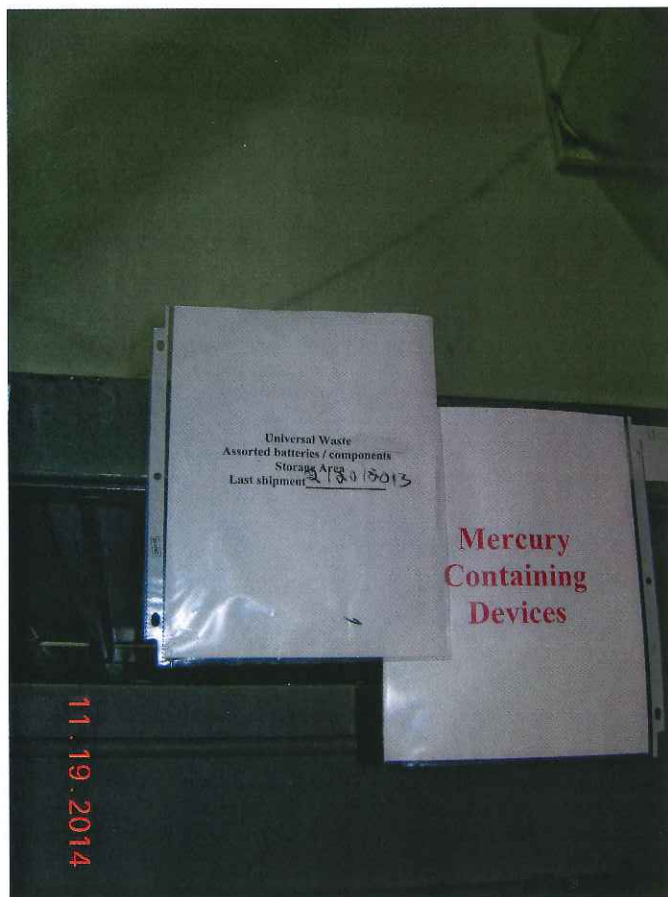


Photograph #8 – Recycling Area, 5-Gallon Pail Located By Aerosol Can Puncturing Device

Serigraph, Inc.
West Bend, Wisconsin
11/19/2014

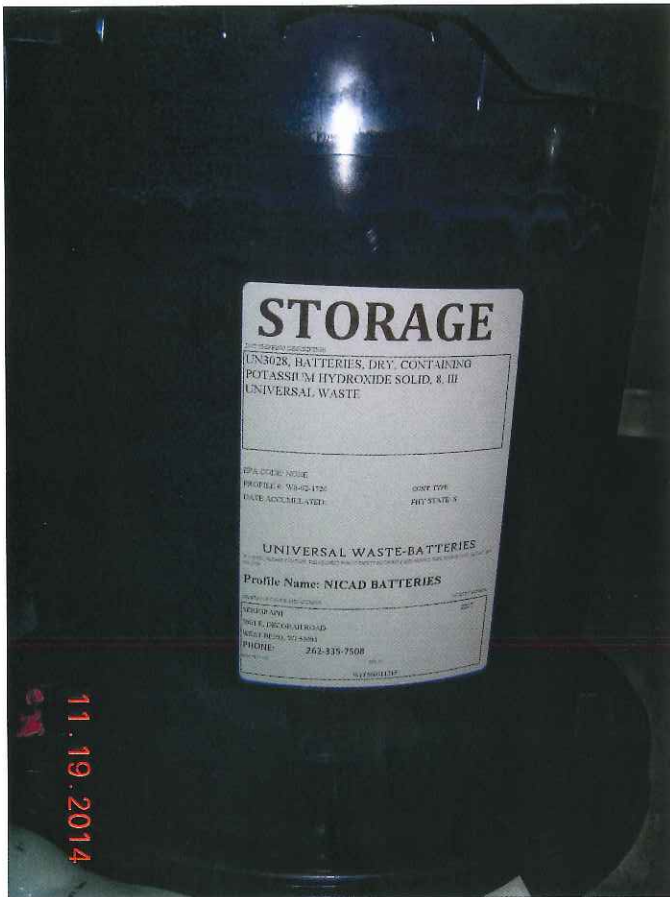


Photograph #9 – Recycling Area, Excluded Solvent Contaminated Wipes



Photograph #10 – Recycling Area, Universal Waste Battery Area

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West Bend, Wisconsin
11/19/2014



Photograph #11 – Recycling Area, Container of Universal Waste Batteries

